

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LIAONING CHENG DA JOYLAND CO.,)	
LTD., f/k/a, LIAONING CHENGDA)	Case No. 08-cv-4604 (Rakoff)
ENTERPRISES, CO. LTD.,)	
)	
Plaintiff,)	
v.)	
)	
ALSTON TAYLOR USA, INC., CHINARED)	PLAINTIFF'S RULE 26(a)
USA, AND ALSTON TAYLOR USA INC.)	<u>DISCLOSURES</u>
D/B/A CHINARED USA,)	
)	
Defendants.)	
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Plaintiff Liaoning Cheng Da Joyland Co., Ltd., formerly known as Liaoning Chengda Enterprises Co., Ltd. (“Plaintiff”), by its attorneys DeHeng Chen Chan, LLC, hereby provides the following to Defendants pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

1. Name, address and telephone number of each individual likely to have discoverable information:

a. Johnny Cao. Mr. Cao is chairman of Plaintiff's board of directors.

Mr. Cao may be contacted through counsel for Plaintiff.

b. Betty Bai. Ms. Bai is Plaintiff's vice president. Ms. Bai may be contacted through counsel for Plaintiff.

c. Guangzhen Che. Mr. Che is President of Liaoning Tianpai Knitting Co., Ltd. Mr. Che may be contacted through counsel for Plaintiff.

d. Da Meng. Ms. Meng is Plaintiff's China attorney and may be contacted through counsel for Plaintiff.

e. Fuping Shen. Mr. Shen is Plaintiff's China attorney and may be contacted through counsel for Plaintiff.

f. Jeff Zhou. Mr. Zhou is Defendants' President. Defendants have better access to contact information for him than does Plaintiff.

g. Qiming Lu. Mr. Lu is Defendants' Shanghai Office representative. Defendants have better access to contact information for him than does Plaintiff.

h. Brenda (last name unknown). Defendants have better access to contact information for her than does Plaintiff.

i. Robert Barnard. Mr. Barnard was Defendants' attorney during the SWAK bankruptcy proceeding. Defendants have better access to contact information for him than does Plaintiff.

j. Bo Hong. Ms. Hong was Defendants' attorney during the SWAK bankruptcy proceeding. Defendants have better access to contact information for her than does Plaintiff.

k. Ken Silverman. Mr. Silverman was SWAK's bankruptcy attorney. Defendants have better access to contact information for Mr. Silverman than does Plaintiff.

l. Gerard Catalanello, Esq. Defendants have better access to contact information for him than does Plaintiff.

m. Robert Meier, CPA. Defendants have better access to contact information for him than does Plaintiff.

n. Individuals listed in Defendants' Rule 26(a) Initial Disclosure.

o. Plaintiff reserves the right to supplement this response should additional information come to Plaintiff's attention.

2. Plaintiff may use the following documents to support its claims or defenses. The parties, their counsel and the United States Bankruptcy Court, Eastern District of New York, are in possession of these documents:

- a. Business records, including but not limited to contracts and purchase orders, of Plaintiff for transactions relating to this matter.
- b. Email communications to and from representatives of Defendants and Plaintiff regarding transactions relating to this matter.
- c. Invoices from Plaintiff to Defendants for transactions relating to this matter.
- d. Letters to and from counsel to Plaintiff and Defendants regarding transactions relating to this matter.
- e. Bankruptcy records of SWAK.
- f. Other than the material in possession of both parties, as Defendants state, Plaintiff reserves its right to supplement this response upon the completion of discovery.

3. Computation of Damages:

- a. Damages are sought in the amount of \$324,751.72 for Defendants' failure to pay for goods sold and delivered.
- b. Plaintiff is considering adding a claim for lost profits.

Dated: July 24, 2008

DeHeng Chen Chan, LLC.

By: /s/ Matthew C. Gruskin

Matthew C. Gruskin
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(212) 608-9050 (Fax)
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on **July 24, 2008**, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following participants:

Wong Wong & Associates, P.C.
150 Broadway, Suite 1588
New York, NY 10038
Tel: (212) 566-8080
Fax: (212) 566-8960
Attorneys for Defendants.

I also certify that on **July 22, 2008**, a true and correct copy of Plaintiff's Answer to Defendants' Counterclaims was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following participants:

Wong Wong & Associates, P.C.
150 Broadway, Suite 1588
New York, NY 10038
Tel: (212) 566-8080
Fax: (212) 566-8960
Attorneys for Defendants.

I also certify that on **July 18, 2008**, a true and correct copy of Plaintiff's First Request for Production of Documents and Plaintiff's First Set of Interrogatories was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following participants:

Wong Wong & Associates, P.C.
150 Broadway, Suite 1588
New York, NY 10038
Tel: (212) 566-8080
Fax: (212) 566-8960
Attorneys for Defendants.

I further certify that on **July 24, 2008**, a true and correct copy of the foregoing, together with true and correct copies of Plaintiff's Answer to Defendants' Counterclaims, Plaintiff's First Request for Production of Documents and Plaintiff's First Set of Interrogatories was served by certified mail, return receipt requested, upon the following participants:

Wong Wong & Associates, P.C.
150 Broadway, Suite 1588
New York, NY 10038
Tel: (212) 566-8080
Fax: (212) 566-8960
Attorneys for Defendants.

/s/ Matthew C. Gruskin
Matthew C. Gruskin